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By ECF

May 9, 2024

The Honorable Richard M. Gergel
United States District Court
for the District of South Carolina
P.O. Box 835
Charleston, South Carolina 29402

Re: *Tyco Fire Products LP v. AIU Ins. Co., et al.*, No. 2:23-cv-02384 (D.S.C.)

Dear Judge Gergel:

We represent Tyco Fire Products LP (“Tyco”) and write with the consent of the Insurer Defendants,¹ who include all remaining insurers in this action, pursuant to the Court’s Order dated April 29, 2024 (ECF 297). Further to the Court’s Order, the parties have conferred regarding the case schedule in this matter and jointly submit the Joint Proposed Second Amended Scheduling Order (“Amended Scheduling Order”) enclosed as **Exhibit 1** to this letter.

As reflected by the proposed Amended Scheduling Order, the parties jointly and respectfully request that the Court amend the case schedule as follows:

- **July 29, 2024:** Deadline for dispositive motions and Daubert motions.
- **August 21, 2024:** Deadline for responses to those motions.
- **September 6, 2024:** Deadline for replies.

The parties appreciate the Court’s continued attention to this matter.

¹ The “Insurer Defendants” are: Allianz Global Risks US Insurance Company; Hamilton Insurance Designated Activity Company, Liberty Surplus Insurance Corporation, and Ohio Casualty Insurance Company; General Security Indemnity Company of Arizona; Starr Indemnity and Liability Insurance Company; TIG Insurance Company; and Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company) and The Travelers Indemnity Company. As of the time of this filing, the Allianz, Liberty, TIG, SCOR, and Starr insurer groups have provided their consent, and the Travelers group has offered no objections.

As reported on May 7, 2024 (ECF 302), Tyco and the AIG Insurers have reached a settlement-in-principle, and have jointly agreed and requested that all deadlines be suspended as to the AIG Insurers while Tyco and AIG finalize their formal written settlement agreement. The proposed scheduling order being submitted today is not intended to apply to the AIG Insurers.

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Respectfully submitted,

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cc: All Counsel of Record (by ECF)